

CH2MHILL TRANSMITTAL

To: Idaho Department of Environmental
Quality
1410 N. Hilton
Boise, ID 83706

From: Rick McCormick

Attn: Mr. Bill Rogers

Date: April 9, 2007

Re: 15- Day Pre-Permit Construction Application

We Are Sending You:

X	Attached	Under separate cover via	
	Shop Drawings	Documents	Tracings
	Prints	Specifications	Catalogs
	Copy of letter	Other:	

Quantity	Description
1	15-Day PTC Application – Glanbia Foods, Inc. (includes CD w/ modeling files & emission calcs) \$1,000 Application Fee included

If material received is not as listed, please notify us at once

Remarks:

Copy To:

RECEIVED
APR 10 2007
Department of Environmental Quality
State Air Program

PTC (15-Day Pre-Permit Construction) Application

Glanbia Foods, Inc.,

Gooding, Idaho

Prepared for
Glanbia Foods, Inc.

April 2007

CH2MHILL

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1.0 Introduction

Glanbia Foods, Inc. (Glanbia) is proposing to increase lactose production at their Gooding, Idaho Facility. Glanbia is requesting a Permit to Construct (PTC) for an increase in lactose whey powder production. Currently, the lactose system has not required a PTC. To expedite construction for this lactose production increase, the requirements for Pre-Permit construction approval will be followed in accordance with the *Rules for the Control of Air Pollution in Idaho* (IDAPA) 58.01.01.213.02.

In a 1996 technical PTC memorandum prepared by the Idaho Department of Environmental Quality (DEQ), a Director's exemption was granted for the lactose scrubber (IDAPA 16.01.01.220.04). It was determined that the scrubber would not have any operating limitations since it can operate at a maximum capacity continuously without having the potential to emit more than 100 tpy of a regulated pollutant. Since this determination was made, the *Rules for the Control of Air Pollution in Idaho* (IDAPA 58.01.01.213.02) have been revised and a Directors' exemption is no longer applicable. Therefore, Glanbia is seeking a PTC for the lactose scrubber.

Additionally, in the 1996 technical PTC memorandum, DEQ also determined that the lactose baghouse is used to recover dried whey product. This process could not operate without the baghouse because removing it results in a total loss of product. Therefore, the baghouse is considered process equipment.

An informational meeting will be held at the New Meeting Hall at the Gooding County Fairgrounds located at 201 Lucy Lane in Gooding, Idaho from 7 to 8 PM on Friday April 13, 2007 in accordance with the Rules for the Control of Air Pollution in Idaho, Idaho Administrative Code, IDAPA 58.01.01.213.02 – *Permit to Construct Procedures For Pre-Permit Construction*. A copy of the public announcement is included in Appendix A.

An application fee of \$1,000.00 has been included with the application submittal in accordance with IDAPA 58.01.01.226. A signed general information application form (GI) is provided along with the DEQ application forms included in Appendix B.

This pre-permit construction and PTC application includes a process description, plot plan, process flow diagram, emission estimates, modeling protocol and results, and regulatory review. This application is intended to satisfy the requirements for Pre-Permit Construction in accordance with IDAPA 58.01.01.213.

2.0 Process Description

The plant has been in operation since 1996 and was constructed on generally level, agricultural land in Gooding, Idaho. This site, located at the corner of 1728 South and 2300 East Roads, is a rural area surrounded by agriculture.

The Glanbia facility produces whey powder from the lactose production line. The lactose process line sends lactose through an evaporator, concentrator, crystallizer, centrifuge and then a dryer. The exhaust gas from the dryer is sent through a cyclone where product is recovered and recirculated back to the product stream. The product that is not recovered in

the cyclone passes through a scrubber. From the dryer, lactose is transferred to a sifter, mill, classifier and a baghouse where the finished product is recovered. The finished product is sent on for packaging. Traces of particulate matter are released to the atmosphere separately through the top of a scrubber and baghouse. The solids feed rate entering the lactose dryer is currently estimated at 6,626 pounds per hour (lb/hr). The new solids feed rate is estimated at 7,621 lb/hr, resulting in a net increase of 995 lb/hr of whey product. A process flow diagram of the lactose production line is provided in Appendix C.

3.0 Scaled Plot Plan

The scaled Site Plan is provided in Figure 1.

4.0 Emission Estimates

Particulate matter emission calculations were performed for one baghouse and one scrubber associated with the net increase in lactose whey production. Particulate matter less than 10 microns in diameter (PM₁₀) is the only regulated pollutant affected by the production increase.

The net increase in PM₁₀ emissions for the lactose baghouse is below 10% of the significant emission rate of 1.5 tons per year and satisfies the BRC criteria for a Category I exemption in accordance with IDAPA 58.01.01, Sections 220-223. In addition, the lactose baghouse is considered process equipment.

No design changes are required for the lactose dryer. Potential to emit (PTE) emission calculations from the proposed production increase along with baghouse efficiencies supplied by Bay Area Industrial Filtration are included in Appendix D. In addition, there are no toxic air pollutants released associated with this production increase.

5.0 Facility Classification

The Gooding facility is classified as a minor facility because its PTE is less than major source thresholds without requiring PTE limits. The facility is not a designated facility as defined in IDAPA 58.01.01.006.26. The facility is not a major source as defined in IDAPA 58.01.01.008.10.

The facility is located in Gooding County which is classified as unclassifiable for all regulated criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone).

6.0 Ambient Impact Analysis

An air dispersion modeling protocol was prepared by CH2M HILL and submitted to IDEQ on March 23, 2007. The source parameters and modeling assumptions identified in the modeling protocol have changed to reflect only the lactose production system. The protocol was approved via e-mail by Kevin Schilling of IDEQ on March 26, 2007. A copy of the air dispersion modeling protocol and IDEQ approval letter is included in Appendix E.

Each stack is located on the same roof tier within approximately 30 to 40 feet of one another. Stack parameters and corresponding emission rates from the lactose scrubber and lactose baghouse were utilized to evaluate the lowest value of **M** (Merged Parameters for Multiple Stacks) as a representative stack. SCREEN3 modeling was performed using a combined emission rate for PM through a single representative stack (Merged Parameters for Multiple Stacks, pg 2-3, Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised, USEPA, October 1992). A table representing the lowest value of **M** along with a copy of the referenced guidance material is included in Appendix F.

The SCREEN3 modeling program has two building downwash options available, a non-regulatory and a regulatory option. The non-regulatory, Schulman-Scire, building downwash method takes into account the position of the source on the building and is based on the diffusing plume approach with fractional capture of the plume by the near-wake recirculation cavity.

The regulatory, Huber-Snyder, downwash method assumes that the building can be approximated by a simple rectangular box and includes wake effects using automated distance array or discrete distance options. The Huber-Snyder method also includes cavity calculations for two building orientations; first with the minimal horizontal building dimension alongwind, and second with the maximum horizontal dimension alongwind. For this model, CH2M HILL chose to run the Huber-Snyder method for building downwash.

Stack parameters were provided by the manufacturer, Niro Inc., based on the 1996 permit application submittal.

TABLE 1 – STACK PARAMETERS

Parameters	Lactose Scrubber	Lactose Baghouse
Source Type	Point	Point
Emission Rate (g/s)	0.083	0.001
Stack Height (m)	25.6032	25.6032
Stack Inside Diameter (m)	1.1198	0.9997
Stack Exit V (m/s)	38,000	4,800
Stack Gas Exit Temperature (k)	330.37	322.04

Ambient Air quality standards for PM₁₀ are not violated. SCREEN3 modeling results are below the significant contribution levels for PM₁₀ for the annual average of 1 microgram per cubic meter (µg/m³) and the 24-hour average of 5 µg/m³. A table summarizing the SCREEN3 modeling results along with a copy of the SCREEN3 output results are provided in Appendix G.

A copy of a CD containing modeling files and emission calculation are included with this application.

7.0 Applicable Requirements

A regulatory analysis was performed for the Gooding facility to determine the applicability of the state and federal air quality regulations. The regulatory applicability determinations are included in this section.

The following sections address air quality regulatory compliance requirements for the Gooding facility. As detailed below, the source will comply with all applicable Idaho air quality regulations codified in IDAPA 58.01.01, as well as applicable EPA Code of Federal Regulations (CFR).

Federal Regulations

No federal regulations are applicable to this lactose whey production increase or lactose scrubber.

IDAPA Regulations

IDAPA 58.01.01.123

CERTIFICATION OF DOCUMENTS

“All documents, including but not limited to, application forms for permits to construct, application forms for operating permits, progress reports, records, monitoring data, supporting information, requests for confidential treatment, testing reports or compliance certifications submitted to the Department shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.”

IDAPA 58.01.01.124

TRUTH, ACCURACY AND COMPLETENESS OF DOCUMENTS.

“All documents submitted to the Department shall be truthful, accurate and complete.”

IDAPA 58.01.01.125

FALSE STATEMENTS

“No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit, or any applicable rule or order in force pursuant thereto.”

IDAPA 58.01.01.130

STARTUP, SHUTDOWN, SCHEDULED MAINTENANCE, SAFETY MEASURES, UPSET AND BREAKDOWN.

1. Lactose Scrubber

If an excess emission event occurs during startup, shutdown, scheduled maintenance, safety measures, upset or breakdown, Glanbia will comply with IDAPA 58.01.01.130 through 58.01.01.136.

IDAPA 58.01.01.156

TOTAL COMPLIANCE

“Where more than one (1) section of these rules applies to a particular situation, all such rules must be met for total compliance, unless otherwise provided for in these rules.”

IDAPA 58.01.01.157

TEST METHODS AND PROCEDURES

1. Lactose Scrubber

If an emission test is required, Glanbia will adhere to procedures outlined in IDAPA 58.01.01.157.

IDAPA 58.01.01.161

TOXIC SUBSTANCES

“Any contaminant which is by its nature toxic to human or animal life or vegetation shall not be emitted in such quantities or concentrations as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation.”

IDAPA 58.01.01.200

PROCEDURES AND REQUIREMENTS FOR PERMITS TO CONSTRUCT

1. Lactose Scrubber

Upon approval of the 15-Day PTC by DEQ, Glanbia will follow the procedures and requirements outlined under IDAPA 58.01.01.200 for obtaining a PTC.

IDAPA 58.01.01.210

DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE WITH TOXIC STANDARDS

- Lactose Scrubber

“In accordance with Subsection 203.03, the applicant shall demonstrate pre-construction compliance with Section 161 to the satisfaction of the Department. The accuracy, completeness, execution and results of the demonstration are all subject to review and approval by the Department.”

No increase in toxic emission estimates is associated with the lactose whey production increase.

IDAPA 58.01.01.213

PRE-PERMIT CONSTRUCTION

- Lactose Scrubber

Glanbia will comply with procedures and regulations outlined in this section in order to obtain the 15-Day PTC.

IDAPA 58.01.01.213.02. Permit to Construct Procedures for Pre-Permit Construction

IDAPA 58.01.01.213.02.a Informational Meeting

“Within ten (10) days after the submittal of the pre-permit construction approval application, the owner or operator shall hold an informational meeting in at least one (1) location in the region in which the stationary source or facility is to be located. The informational meeting shall be made known by notice published at least ten (10) days before the meeting in a newspaper of general circulation in the county(ies) in which the stationary source or facility is to be located. A copy of such notice shall be included in the application.”

Please see a copy of the Notice in Appendix A.

IDAPA 58.01.01.220 General Exemption Criteria For Permit to Construct Exemptions

IDAPA 58.01.01.221 Category I Exemption

“No permit to construct is required for a source that satisfies the criteria set forth in Section 220 and the following:”

IDAPA 58.01.01.221.01 Below Regulatory Concern

“The maximum capacity of a source to emit an air pollutant under its physical and operational design considering limitations on emissions such as air pollution control equipment, restrictions on hours of operation and restrictions on the type and amount of material combusted, stored or processed shall be less than ten percent (10%) of the significant emission rates set out in the definition of significant at Section 006.”

The lactose baghouse satisfies the BRC exemption criteria for a Category I exemption in accordance with IDAPA 58.01.01, Sections 220-223. However, the lactose scrubber facility does not meet the BRC criteria of a category I exemption outlined in IDAPA 58.01.01.221.01 (Below Regulatory Concern). The maximum capacity of this source to emit an air pollutant is greater than ten percent of the significant emission rate defined in IDAPA 58.01.01.006.90.

IDAPA 58.01.01.300 PROCEDURES AND REQUIREMENTS FOR TIER I OPERATING PERMITS

“The purposes of Sections 300 through 399 are to establish requirements and procedures for the issuance of Tier I operating permits.”

Not applicable – facility classified as minor source.

IDAPA 58.01.01.577

**AMBIENT AIR QUALITY STANDARDS FOR SPECIFIC AIR POLLUTANTS
(PM-10, SO_x, NO_x, CO, Pb)**

IDAPA 58.01.01.577.01 PM-10 Standards

1. Lactose Scrubber

IDAPA 58.01.01.577.01.a Primary and Secondary Standards

IDAPA 58.01.01.577.01.a.i Annual Standard

“Fifty (50) micrograms per cubic meter, as an annual arithmetic mean -- never expected to be exceeded in any calendar year.”

IDAPA 58.01.01.577.01.a.ii 24-hr Standard

“One hundred fifty (150) micrograms per cubic meter as a maximum twenty-four (24) hour concentration -- never expected to be exceeded more than once in any calendar year.”

IDAPA 58.01.01.578

DESIGNATION OF ATTAINMENT, UNCLASSIFIABLE, AND NONATTAINMENT AREAS

The proposed site for the stationary sources, Gooding County, is in an attainment or unclassifiable area for NO_x, CO, SO_x, ozone, lead, and PM₁₀; the appropriate modeling parameters will reflect this designation.

IDAPA 58.01.01.590

NEW SOURCE PERFORMANCE STANDARDS

The proposed sources are not subject to 40 CFR Part 60.

IDAPA 58.01.01.591

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

The proposed sources are not regulated under 40 CFR Part 61 and 40 CFR Part 63.

IDAPA 58.01.01.625

VISIBLE EMISSIONS

1. Lactose Scrubber

“A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by this section.”

It is proposed that the facility will conduct a quarterly inspection of the scrubber during periods when the engines are in operation. The inspection will be conducted during daylight hours and under normal operating conditions. The inspection will consist of a see/no see evaluation. If any visible emissions are present from the point of emission, appropriate corrective action will be taken as expeditiously as practicable, or a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625 will be performed. Records of the results of each visible emission inspection and each opacity test when conducted will be maintained. The records will include, at a minimum, the date and results of each inspection and test and a description of the following: the assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

IDAPA 58.01.01.650

RULES FOR CONTROL OF FUGITIVE DUST

1. Material Handling
2. Right of ways

Glanbia will take all reasonable precautions to prevent the generation of fugitive dust as outlined under IDAPA 58.01.01.650-651.

IDAPA 58.01.01.651

GENERAL RULES

1. Material Handling
2. Right of ways

"All reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, consideration will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions may include, but are not limited to, the following:"

IDAPA 58.01.01.651.01 Use Of Water or Chemicals

"Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land."

IDAPA 58.01.01.651.02 Application Of Dust Suppressants

"Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust."

IDAPA 58.01.01.651.03 Use Of Control Equipment.

"Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations."

IDAPA 58.01.01.651.04 Covering Of Trucks

"Covering, when practical, open bodied trucks transporting materials likely to give rise to airborne dusts."

IDAPA 58.01.01.651.05 Paving

"Paving of roadways and their maintenance in a clean condition, where practical."

IDAPA 58.01.01.651.06 Removal Of Materials

"Prompt removal of earth or other stored material from streets, where practical."

IDAPA 58.01.01.675

FUEL BURNING EQUIPMENT -- PARTICULATE MATTER

Glanbia will adhere to guidelines under IDAPA 58.01.01.675 through IDAPA 58.01.01.681 with regards to particulate emissions for fuel burning equipment.

IDAPA 58.01.01.676

STANDARDS FOR NEW SOURCES

“A person shall not discharge into the atmosphere from any fuel burning equipment with a maximum rated input of ten (10) million BTU’s per hour or more, and commencing operation on or after October 1, 1979, particulate matter in excess of the concentrations shown in the following table:”

TABLE 2 - IDAPA 58.01.01.676 STANDARDS FOR NEW SOURCES

Fuel Type	Allowable Particulate gr/dscf	Emissions, @Oxygen
Diesel	0.05	3%
Gas	0.015	3%

IDAPA 58.01.01.701

PARTICULATE MATTER - NEW EQUIPMENT PROCESS WEIGHT LIMITATIONS

1. Lactose Scrubber
2. Lactose Baghouse

As detailed in Appendix D, Glanbia complies with the applicable process weight requirements outlined under IDAPA 58.01.01.700 through IDAPA 58.01.01.703.

IDAPA 58.01.01.700.02 **Minimum Allowable Emission**

“Notwithstanding the provisions of Sections 701 and 702, no source shall be required to meet an emission limit of less than one (1) pound per hour.”

IDAPA 58.01.01.700.03.b **Averaging Period - Worst Case**

“One (1) hour of operation representing worst-case conditions for the emissions of particulate matter.”

IDAPA 58.01.01.775

RULES FOR CONTROL OF ODORS

Glanbia will follow the guidelines set under IDAPA 58.01.01.775 through IDAPA 58.01.01.776 to control odorous emissions from all sources for which no gaseous emission control rules apply.

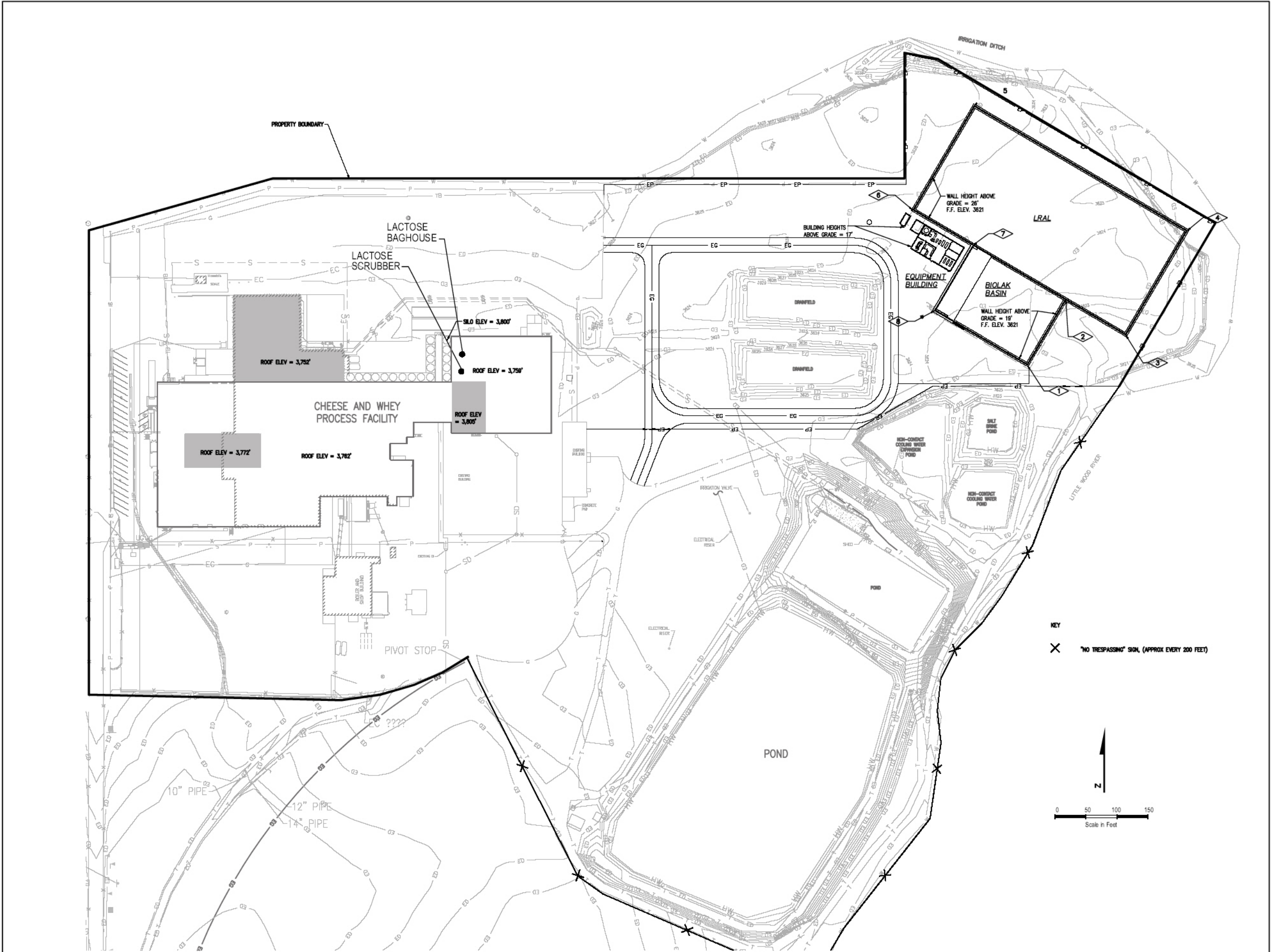
IDAPA 58.01.01.776

GENERAL RULES

IDAPA 58.01.01.776.01 General Restrictions

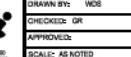
“No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids into the atmosphere in such quantities as to cause air pollution.”

Figure



NOTICE: THE DESIGN IS PROVIDED AS A CONCEPTUAL DESIGN AND IS NOT TO BE USED FOR CONSTRUCTION. IT IS THE RESPONSIBILITY OF THE USER TO OBTAIN ALL NECESSARY PERMITS AND TO VERIFY THE ACCURACY OF THE DESIGN. THE DESIGN IS NOT TO BE USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN CONSENT OF THE DESIGNER.

NO.	REVISION	BY	CHK	DATE	NO.	REVISION	BY	CHK	DATE



Appendices

Appendix A
Public Meeting Announcement

~ Public Notices ~

half of lot 3 in 2nd addition, as the same plat thereof, office of the city. Commonly evaga Street. Said sale will be held on or after the 1st day of August 31, No. 207746, Gooding County, GRANTORS COMPLY WITH 4(a), IDAHO ENTATION IS ARE OR ARE RESPONSIBLE ATION. The sale is to be by the monthly by 1, 2006 of impounds and nts due there- ges; together ms advanced nt to the terms deed of trust. owing as of ation-secured is \$72,562.26, ts and expens- enforcing the or in this sale, and/or reason- s authorized in secured by the l of Trust. First nce Company eonveyance ox 22004 El 04 (800)546- 15, 2007 First nce Company n M. Meyerle, 94 03/22/07, 4/12/07 Publishing Our EET n Desk .S. # 0 400 496 G54399

bear the name of the candidate, state the term of which declaration of candidacy is made, and bear the signature not less than five (5) school district electors resident of the trustee zone of which the candidate is resident. As provided by Idaho Code, Section 33-502A no write-in vote shall be counted unless a declaration of intent has been filed with the District Clerk indicating that the person desires the office and is legally qualified to assume the duties of school trustee if elected. The declaration of intent shall be filed no later than five (5) days before the day of election. Each candidate for the office of trustee must be a registered voter, a resident and elector of the trustee zone he/she seeks to represent, and shall be voted for and elected only by the qualified electors of the trustee zone of which zone of which he/she is a candidate. Any person voting, or offering to vote, in any school election must be, at the time of election: 1. Eighteen years of age, a United States citizen who resides in this State of Idaho, and who has resided in this school district at least thirty (30) days next preceding the election in which the elector desires to vote. 2. The elector must be a resident of the same trustee zone as the candidate, or candidates, for whom the elector offers to vote for at least thirty (30) days next preceding the election in which the elector desires to vote. 3. The elector must be a registered voter, registered with the County Clerk and Recorder, as required in Section 34-404 of the Idaho Code. Absentee voting shall be permitted as provided by Section 33-405, as amended, Idaho Code. Any qualified trustee zone elector who expects to be absent from the District on the day of the election or who will be unable because of physical disability or blindness, to go to the polling place may make written application to the Clerk of the District for a ballot of the kind to be voted on at the election, which application shall contain the name of the elector and the electors present address. Dated this 22nd day of March 2007. Michele Elliott, Clerk of Board Gooding County, State of Idaho PUB: 4/5 - 4/12 G54912

COMMISSIONER'S MINUTES REGULAR SESSION, MARCH 12, 2007.
This is a summary of the minutes of the March 12, 2007 Gooding County Board of County Commissioners meeting. Minutes in their entirety are on file in the office of the Gooding County Clerk. The Chairman Faulkner convened the regular session with Commissioner Williams, Commissioner Edwards and the Clerk, Denise Gill present. CLAIMS Commissioner Williams moved to

ORDINANCE NO. 656
AN ORDINANCE OF THE CITY OF GOODING, IDAHO, VACATING A PORTION OF 9th AVENUE EAST BORDERING BLOCK 137 OF THE PLAT OF CITY OF GOODING, IDAHO AS THE SAME IS LAID OUT AND DESCRIBED IN THE PLAT THEREOF. WHEREAS, The City of Gooding, has determined that part of 9th Avenue East adjacent to Lot 24 of Block 137 has never been used as a road right of way; and, WHEREAS, the Gooding City Council has determined that it would be in the City's best interest to vacate that portion of 9th Avenue. NOW, THEREFORE, be it ordained by the Mayor and City Council of the City of Gooding, Idaho: **Section 1:** That the north 20 feet of 9th Avenue East bordering Lot 24 in Block 137 of the City of Gooding, according to the plat thereof on file, be vacated. **Section 2:** The vacated portion is bounded on the North by Lot 24 of Block 137 and on the South by 9th Avenue East, therefore such vacated portion shall revert to the owner of the property, lying north of the vacated portion of 9th Avenue East. **Section 3:** This ordinance shall be in full force and effect from and after its passage and publication. Passed by the council and approved by Mayor of the City of Gooding, County of Gooding, State of Idaho, this 19th day of March, 2007. CITY OF GOODING By: /s/ William Duke Morton Mayor ATTEST: /s/ Carmen Kersen, Clerk PUB: 4/5 - 4/12 G54914

NOTICE OF PUBLIC HEARINGS
NOTICE IS HEREBY GIVEN by the Gooding County Planning and Zoning Commission that the following Public Hearings will be held on April 30, 2007, starting at 7:00 p.m., at the Gooding County Planning and Zoning Meeting Room, 145 7th Ave East, Gooding, ID. **SPECIAL USE PERMIT 2nd Hearing for additional information** - Dick Walte, 321 Valley Road West, Hagerman, ID 83332. The grid address is approx. 2425 S. 1050 E., Hagerman, ID, located in Section 1, township 7 South, Range 13 EBM, In an Agricultural Zoning District. The Special Use Permit application is to allow a Campground structure not intended for permanent human occupancy. The Structure is already built and does not meet the required 300' setback from the Snake River Canyon rim. A Geotechnical Investigation and Engineering Report is in the file. **SPECIAL USE PERMIT** - Garry and Peggy Pedrow, 104 Riverside Lane Buhl, ID 83316. The grid address is approx. 17740 US Hwy 30, Bliss, located in Section 27, Township 6 South, Range 13 EBM, in a Transition 1 (T-1) Zoning District. The Special Use Permit application

All this is in accordance to Idaho Code: 67-6512, Gooding County Zoning Ordinance #78 and CAFO Ord. #77. Dated this 27th day of March, 2007. Submitted by Judy Davis Administrator P&Z PUB: 4/5 - 4/12 G54916

LEGAL NOTICE
NOTICE IS HEREBY GIVEN: That the Gooding Soil Conservation District will hold a regular District Board Meeting April 12, 2007 at 1:00 p.m. in Gooding at the USDA office building on 820 Main Street. The Gooding Soil Conservation District meeting will include a time for public review of the Annual Resource Conservation Plan of Work. The public is invited to review and comment on the Annual Resource Conservation Plan or Work. To obtain a copy of the plan contact the Conservation Districts Administrative Assistant at (The Gooding SCD) @ 208-934-8481 ext 3, to schedule a time to speak, or if special arrangements are needed at the meeting. PUB: 4/5 - 4/12 G54917

LEGAL NOTICE - PUBLIC MEETING ANNOUNCEMENT
GLANBIA FOODS, INC. OF GOODING, IDAHO.
An informational meeting will be held at the New Meeting Hall at the Gooding County Fairgrounds located at 201 Lucy Lane in Gooding, Idaho from 7 to 8 PM on Friday April 13, 2007 in accordance with the Rules for the Control of Air Pollution in Idaho, Idaho Administrative Code, IDAPA 58.01.01.213.02 n Permit to Construct Procedures For Pre-Permit Construction. The purpose of the meeting is to inform the general public of Glanbia Foods proposed whey production increase for two of their existing process systems at their Gooding facility. In addition, this meeting will serve to fulfill the air quality pre-permit construction requirement per IDAPA 58.01.01.213.02. A scrubber will be used to control particulate matter emissions emanating from the lactose production line. The production increase will result in a combined particulate matter increase of approximately 3.0 tons per year. The result is a small increase in particulate matter emissions and the facility will maintain its classification as a minor source. PUB: 4/5 - 4/12 G54918

FAIR HOUSING RESOLUTION #190
(Population Less Than 5,000)
LET IT BE KNOWN TO ALL PERSONS OF THE City of Gooding that discrimination on the basis of race, color, religion, gender or national origin in the sale, rental, leasing or financing of housing or land to be used for construction of housing or in the provision of brokerage services is prohibited by Title VIII of the 1968 Civil Rights Act

absent from the District on April 24, 2007, or who will be unable, because of physical disability or blindness, to go to a polling place, may vote by absentee ballot. Written application for an absentee ballot may be made to the Clerk of the Board of Trustees on a form made available at the Gooding School District Office, 507 Idaho Street, Gooding, Idaho, on Monday through Friday 8:00 a.m. to 4:00 p.m. Such application must be made no later than 5:00 p.m. April 23, 2007. Electors applying by mail should submit their requests as soon as possible. The absentee ballot must be received by the Clerk no later than 8:00 p.m. on the day of the election. Kathryn Thompson Clerk PUB: 4/5 - 4/12 G54920

NOTICE OF TRUSTEE'S SALE
T.S. No. 200501912-25769 Loan No 0621538644 On 07/20/2007 at 11:00 am (recognized local time), at the following location in the County of Gooding, State of Idaho: In the lobby of Land Title & Escrow, Inc., 706 Main Street, Gooding, ID 83330, First American Title Insurance Company, as Trustee will sell at public auction, to the highest bidder, for cash, in lawful money of the United States, all payable at the time of sale, the following described real property, situated in the County of Gooding, State of Idaho, and described as follows: PARCEL NO. 1 TOWNSHIP 7 SOUTH, RANGE 14 EAST OF THE BOISE MERIDIAN, GOODING COUNTY, IDAHO Section 31: Part of Lot 1 described as follows: Commencing at the Northwest corner of said Lot 1; Thence South 89°43' East 550.00 feet along the Northwly boundary of said Lot 1; Thence South 0°01' East 411.00 feet to THE TRUE POINT OF BEGINNING Thence South 89°43' East 529.80 feet to the Easterly boundary of said Lot 1; Thence South 0°01' East 139.77 feet along the Easterly boundary of said Lot 1; Thence North 83°09'15" West 471.50 feet; Thence North 35°35'50" West 106.00 feet to THE TRUE POINT OF BEGINNING. PARCEL NO 2 TOWNSHIP 7 SOUTH, RANGE 14 EAST OF THE BOISE MERIDIAN, GOODING COUNTY, IDAHO Section 31: Part of Lot 1 described as follows: Commencing at the Northwest corner of said Lot 1; Thence South 89°43' East 550.00 foot along the Northwly boundary of said Lot 1; Thence South 0°01' East 411.00 feet; Thence South 35°35'50" East 106.00 feet to THE TRUE POINT OF BEGINNING Thence South 35°35'50" East 106.00 feet, Thence South 69°28'21" East 434.05 feet to the Easterly boundary of said Lot 1; Thence North 0°01' West 182.19 feet along the Easterly boundary of said Lot 1; Thence North 83°09'15" West 471.50 feet to THE TRUE POINT OF BEGINNING. PARCEL NO. 3 TOGETHER WITH an easement

Appendix B
DEQ Application Forms



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 2
 02/13/07

Please see instructions on page 2 before filling out the form.

COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER			
1. Company Name	Glanbia Foods, Inc.		
2. Facility Name	Glanbia Foods, Gooding Facility	3. Facility ID No.	047-00008
4. Brief Project Description - One sentence or less	Increase in lactose whey process throughput		
PERMIT APPLICATION TYPE			
5. <input type="checkbox"/> New Facility <input type="checkbox"/> New Source at Existing Facility <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modify Existing Source: Permit No.: _____ Date Issued: _____ <input type="checkbox"/> Required by Enforcement Action: Case No.: _____			
6. <input checked="" type="checkbox"/> Minor PTC <input type="checkbox"/> Major PTC			
FORMS INCLUDED			
Include	N/A	Forms	DEQ Verify
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form GI – Facility Information	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form EU0 – Emissions Units General	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU1 - Industrial Engine Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU2 - Nonmetallic Mineral Processing Plants Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU3 - Spray Paint Booth Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU4 - Cooling Tower Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU5 – Boiler Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form HMAP – Hot Mix Asphalt Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CBP - Concrete Batch Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form BCE - Baghouses Control Equipment	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form SCE - Scrubbers Control Equipment	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms EI-CP1 - EI-CP4 - Emissions Inventory– criteria pollutants (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	PP – Plot Plan	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms MI1 – MI4 – Modeling (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form FRA – Federal Regulation Applicability	<input type="checkbox"/>

DEQ USE ONLY	
Date Received	
Project Number	
Payment / Fees Included? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Check Number	



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02/13/07

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All information is required. If information is missing, the application will not be processed.

IDENTIFICATION

1. Company Name	Glanbia Foods, Inc.
2. Facility Name (if different than #1)	Glanbia Foods, Gooding Facility
3. Facility I.D. No.	047-00008
4. Brief Project Description:	

FACILITY INFORMATION

5. Owned/operated by: (✓ if applicable)	<input type="checkbox"/> Federal government <input type="checkbox"/> County government <input type="checkbox"/> State government <input type="checkbox"/> City government
6. Primary Facility Permit Contact Person/Title	Todd Hughes, Environmental Manager
7. Telephone Number and Email Address	(208) 934-9835 thughes@glanbiausa.com
8. Alternate Facility Contact Person/Title	Doug Pettinger, Director, Environmental, Health and Safety
9. Telephone Number and Email Address	(208) 934-9812 dpettinger@glanbiausa.com
10. Address to which permit should be sent	1728 South 2300 East
11. City/State/Zip	Gooding, Idaho 83330
12. Equipment Location Address (if different than #9)	
13. City/State/Zip	
14. Is the Equipment Portable?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>RMC 4/17/07</i>
15. SIC Code(s) and NAISC Code	Primary SIC: 3023 2022 Secondary SIC (if any): NAICS: 311514 301513 <i>RMC 4/17/07</i>
16. Brief Business Description and Principal Product	Cheese and Whey Processing
17. Identify any adjacent or contiguous facility that this company owns and/or operates	

PERMIT APPLICATION TYPE

18. Specify Reason for Application	<input type="checkbox"/> New Facility	<input type="checkbox"/> New Source at Existing Facility
	<input type="checkbox"/> Modify Existing Source: Permit No.: _____ Date Issued: _____	
	<input checked="" type="checkbox"/> Unpermitted Existing Source:	
	<input type="checkbox"/> Required by Enforcement Action: Case No.: _____	

CERTIFICATION

IN ACCORDANCE WITH IDAPA 58.01.01.123 (RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO), I CERTIFY BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION IN THE DOCUMENT ARE TRUE, ACCURATE, AND COMPLETE.

9. Responsible Official's Name/Title	Barney Krueger, VR Technical Services	
10. RESPONSIBLE OFFICIAL SIGNATURE	<i>Barney Krueger</i>	Date: 4/5/2007
1. <input checked="" type="checkbox"/> Check here to indicate you would like to review a draft permit prior to final issuance.		

[illegible]



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PERMIT TO CONSTRUCT APPLICATION

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02/14/07

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IDENTIFICATION							
Company Name:		Facility Name:			Facility ID No:		
Glanbia Foods, Inc.		Glanbia Foods, Gooding Facility			047-00008		
Brief Project Description:		Increase in lactose whey process throughput					
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION							
1. Emissions Unit (EU) Name:		LACTOSE SCRUBBER					
2. EU ID Number:		SC-01					
3. EU Type:		<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: Date Issued:					
4. Manufacturer:		NIRO, INC.					
5. Model:		NIRO 4.18					
6. Maximum Capacity:							
7. Date of Construction:		1996					
8. Date of Modification (if any)							
9. Is this a Controlled Emission Unit?		<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.					
EMISSIONS CONTROL EQUIPMENT							
10. Control Equipment Name and ID:		Lactose Scrubber					
11. Date of Installation:		1996	12. Date of Modification (if any):				
13. Manufacturer and Model Number:		NIRO 4.18					
14. ID(s) of Emission Unit Controlled:							
15. Is operating schedule different than emission units(s) involved?:		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
Control Efficiency		Pollutant Controlled					
		PM	PM10	SO ₂	NO _x	VOC	CO
		52 %					
17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.							
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)							
18. Actual Operation		8760 HRS/YEAR					
19. Maximum Operation		8760 HRS/YEAR					
REQUESTED LIMITS							
20. Are you requesting any permit limits?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)					
<input type="checkbox"/> Operation Hour Limit(s):							
<input type="checkbox"/> Production Limit(s):							
<input type="checkbox"/> Material Usage Limit(s):							
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports					
<input type="checkbox"/> Other:							
21. Rationale for Requesting the Limit(s):							



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PERMIT TO CONSTRUCT APPLICATION

Revision 2
 02/13/07

Please see instructions on page 2 before filling out the form.

IDENTIFICATION									
Company Name: Glanbia Foods, Inc.				Facility Name: Glanbia Food, Gooding Facility			Facility ID #: 047-00008		
Brief Project Description:									
IDENTIFICATION				SCRUBBER					
1.	2.	3.	4.	5.	6.	7.	8.	9.	10.
Emission Unit	EU ID No.	CE ID No.	Stack ID No.	Manufacturer Name	Model No.	Type	Dimensions In Feet (Ht x Dia x L)	Water Flow (gpm)	Pressure Drop (in H ₂ O)
Lactose Scrubber	SC-01			Niro, Inc.	Niro 4.18				



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Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 2
02/14/07

Please see instructions on page 2 before filling out the form.

IDENTIFICATION							
Company Name:		Facility Name:			Facility ID No:		
Glanbia Foods, Inc.		Glanbia Foods, Gooding Facility			047-00008		
Brief Project Description:		Increase in lactose whey process throughput					
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION							
1. Emissions Unit (EU) Name:		LACTOSE BAGHOUSE					
2. EU ID Number:		BH-01					
3. EU Type:		<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: Date Issued:					
4. Manufacturer:		NIRO, INC.					
5. Model:		400-12					
6. Maximum Capacity:							
7. Date of Construction:		1996					
8. Date of Modification (if any)							
9. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.					
EMISSIONS CONTROL EQUIPMENT							
10. Control Equipment Name and ID:							
11. Date of Installation:		12. Date of Modification (if any):					
13. Manufacturer and Model Number:							
14. ID(s) of Emission Unit Controlled:							
15. Is operating schedule different than emission units(s) involved?:		<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
Control Efficiency		Pollutant Controlled					
		PM	PM10	SO ₂	NO _x	VOC	CO
		99.99%					
17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.							
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)							
18. Actual Operation		8760 HRS/YEAR					
19. Maximum Operation		8760 HRS/YEAR					
REQUESTED LIMITS							
20. Are you requesting any permit limits?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)					
<input type="checkbox"/> Operation Hour Limit(s):							
<input type="checkbox"/> Production Limit(s):							
<input type="checkbox"/> Material Usage Limit(s):							
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports					
<input type="checkbox"/> Other:							
21. Rationale for Requesting the Limit(s):							



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Hotline - 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION
Revision 2
02/14/2007

Company Name: Gianbia Foods, Inc.

Facility Name:

Gianbia Gooding

Facility ID No.:

047-00008

Brief Project Description: Increase in lactose whey process throughput

Please see instructions on next page before filling out the form.

SUMMARY OF FACILITY WIDE EMISSION RATES FOR CRITERIA POLLUTANTS - POINT SOURCES

1.		PM ₁₀		SO ₂		NO _x		CO		VOC		Lead	
Emissions units	Stack ID	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Point Source(s)													
Boiler 1 (29.35 -NG)	BOILER1	0.21	0.92	0.02	0.07	2.78	12.17	2.33	10.22	0.15	0.67	0.00	0.00
Boiler 2 (Dual 25.1) - NG	BOILER2	0.36	0.69	1.27	0.05	3.59	9.12	2.00	7.66	0.13	0.50	0.00	0.00
Boiler 2 (Dual 25.1) - Diesel	BOIL2D	0.36	0.19	1.27	0.69	3.59	1.94	0.90	0.48	0.10	0.05	0.00	0.00
Boiler 3 (Dual 25.1) - NG	BOILER3	0.36	0.69	1.27	0.05	3.59	9.12	2.00	7.66	0.13	0.50	0.00	0.00
Boiler 3 (Dual 25.1) - Diesel	BOIL3D	0.36	0.19	1.27	0.69	3.59	1.94	0.90	0.48	0.10	0.05	0.00	0.00
Boiler 4 (25.1) - NG	BOILER4	0.18	0.79	0.01	0.06	2.38	10.41	2.00	8.74	0.13	0.57	0.00	0.00
Boiler 5 (Biogas)	BOILER5	0.17	0.73	6.87	30.11	1.98	8.65	2.51	11.00	0.27	1.17	0.00	0.00
Flare	FLARE	0.08	0.37			0.80	3.50	4.35	19.04	0.74	3.24		
WPC Dryer	DRYER1	0.07	0.29	0.01	0.02	0.87	3.81	0.73	3.20	0.05	0.21	0.00	0.00
Generator	GEN1	0.57	0.06	2.88	0.29	1.82	1.82	0.48	0.48	0.05	0.05	0.00	0.00
Heater 1 (1.5)	HEAT1	0.01	0.05	0.00	0.00	0.14	0.62	0.12	0.52	0.01	0.03	0.00	0.00
Heater 2 (5.89)	HEAT2	0.04	0.19	0.00	0.01	0.56	2.44	0.47	2.05	0.03	0.13	0.00	0.00
Heater 3 9 1.374)	HEAT3	0.01	0.04	0.00	0.00	0.13	0.57	0.11	0.48	0.01	0.03	0.00	0.00
Lactose Dryer to Scrubber	SCRUB	4.39	19.21										
name of the emissions unit15													
name of the emissions unit16													
name of the emissions unit17													
name of the emissions unit18													
name of the emissions unit19													
name of the emissions unit20													
name of the emissions unit21													
(insert more rows as needed)													
Total		7.17	24.41	14.87	32.05	25.82	66.11	18.90	72.01	1.90	7.20	0.00	0.00



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PERMIT TO CONSTRUCT APPLICATION

Revision 2
2/14/2007

Please see instructions on next page before filling out the form.

Company Name:	Glanbia Foods, Inc.
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Facility Name:	Glanbia Gooding
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Facility ID No.:	047-00008
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Brief Project Description:	Increase in lactose whey process throughput
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SUMMARY OF EMISSIONS INCREASE (PROPOSED PTE - PREVIOUSLY MODELED PTE) - POINT SOURCES

[illegible]

	DEQ AIR QUALITY PROGRAM 1410 N. Hilton, Boise, ID 83706 For assistance, call the Air Permit Hotline - 1-877-5PERMIT		PERMIT TO CONSTRUCT APPLICATION Revision 2 2/14/2007					
Company Name:	Glanbia Foods, Inc.							
Facility Name:	Glanbia Gooding							
Facility ID No.:	047-00008							
Brief Project Description:	Increase in lactose whey process throughput							
<i>Please see instructions on next page before filling out the form.</i>								
SUMMARY OF AIR IMPACT ANALYSIS RESULTS - CRITERIA POLLUTANTS								
		1.		2.	3.	4.		5.
Criteria Pollutants	Averaging Period	Significant Impact Analysis Results (µg/m3)	Significant Contribution Level (µg/m3)	Full Impact Analysis Results (µg/m3)	Background Concentration (µg/m3)	Total Ambient Impact (µg/m3)	NAAQS (µg/m3)	Percent of NAAQS
PM ₁₀	24-hour	0.65	5				150	
	Annual	0.13	1				50	
SO ₂	3-hr		25				1300	
	24-hr		5				365	
	Annual		1				80	
NO ₂	Annual		1				100	
CO	1-hr		2000				10000	
	8-hr		500				40000	

		DEQ AIR QUALITY PROGRAM 1410 N. Hilton, Boise, ID 83706 For assistance, call the Air Permit Hotline - 1-877-5PERMIT		PERMIT TO CONSTRUCT APPLICATION Revision 2 2/14/2007						
Company Name:		Glanbia Foods, Inc.								
Facility Name:		Glanbia Gooding								
Facility ID No.:		047-00008								
Brief Project Description:		Increase in lactose whey process throughput								
Please see instructions on next page before filling out the form.										
POINT SOURCE STACK PARAMETERS										
1.	2.	3a.	3b.	4.	5.	6.	7.	8.	9.	10.
Emissions units	Stack ID	UTM Easting (m)	UTM Northing (m)	Base Elevation (m)	Stack Height (m)	Modeled Diameter (m)	Stack Exit Temperature (K)	Stack Exit Flowrate (acfm)	Stack Exit Velocity (m/s)	Stack orientation (e.g., horizontal, rain cap)
Point Source(s)										
Lactose Scrubber	SC 01	693.20	4,757.87	1,106.71	25.60	1.12	330.37	38,000.00		vertical
Lactose Baghouse	BH 01	693.20	4,757.87	1,106.71	25.60	0.99	322.04	4,800.00		vertical
name of the emissions unit3										
name of the emissions unit4										
name of the emissions unit5										
name of the emissions unit6										
name of the emissions unit7										
name of the emissions unit8										
name of the emissions unit9										
name of the emissions unit10										
name of the emissions unit11										
name of the emissions unit12										
name of the emissions unit13										
name of the emissions unit14										
name of the emissions unit15										
name of the emissions unit16										
name of the emissions unit17										
name of the emissions unit18										
name of the emissions unit19										
name of the emissions unit20										
name of the emissions unit21										
(insert more rows as needed)										

[illegible]



DEQ AIR QUALITY PROGRAM
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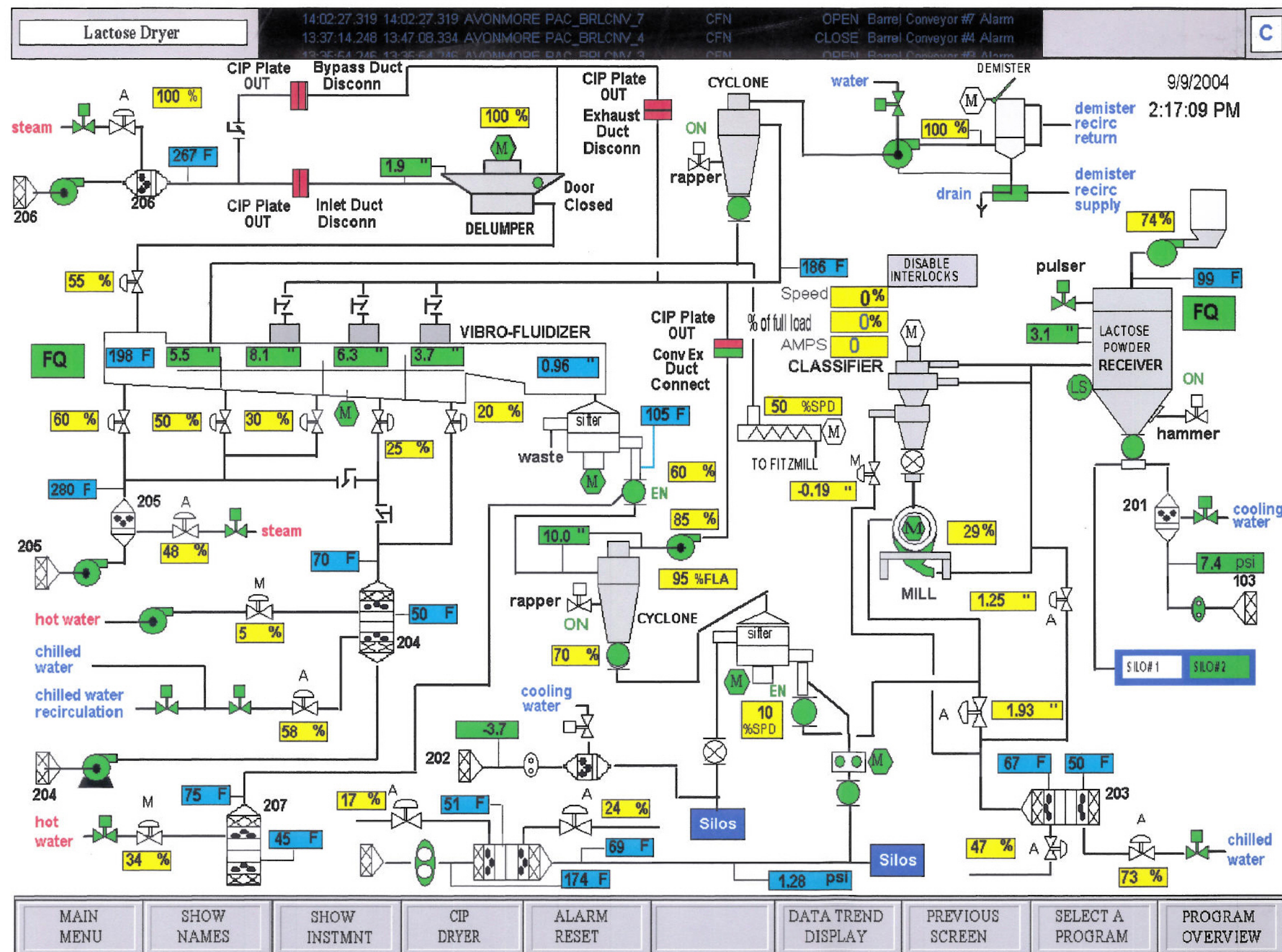
Please see instructions on page 2 before filling out the form.

IDENTIFICATION		
Company Name:	Facility Name:	Facility ID No:
Glanbia Foods, Inc.	Glanbia Foods - Gooding Facility	047-00008
Brief Project Description: Increase in lactose whey process throughput		
APPLICABILITY DETERMINATION		
1. Will this project be subject to 1990 CAA Section 112(g)? (Case-by-Case MACT)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES* <small>* If YES then applicant must submit an application for a case-by-case MACT determination [IAC 567 22-1(3)"b" (8)]</small>	
2. Will this project be subject to a New Source Performance Standard? (40 CFR part 60)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES* <small>*If YES please identify sub-part: _____</small>	
3. Will this project be subject to a MACT (<u>M</u> aximum <u>A</u> chievable <u>C</u> ontrol <u>T</u> echnology) regulation? (40 CFR part 63)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES* <small>*If YES please identify sub-part: _____</small>	
THIS ONLY APPLIES IF THE PROJECT EMITS A HAZARDOUS AIR POLLUTANT		
4. Will this project be subject to a NESHAP (<u>N</u> ational <u>E</u> mission <u>S</u> tandards for <u>H</u> azardous <u>A</u> ir <u>P</u> ollutants) regulation? (40 CFR part 61)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES* <small>*If YES please identify sub-part: _____</small>	
5. Will this project be subject to PSD (<u>P</u> revention of <u>S</u> ignificant <u>D</u> eterioration)? (40 CFR section 52.21)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	
6. Was netting done for this project to avoid PSD?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES* <small>*If YES please attach netting calculations</small>	
IF YOU ARE UNSURE HOW TO ANSWER ANY OF THESE QUESTIONS, CALL THE AIR PERMIT HOTLINE AT 1-877-5PERMIT		

Appendix C

Lactose Process Flow Diagram

Gooding



Appendix D

Emission Calculations/Manufacturer Baghouse Data

Appendix D - Lactose Scrubber PM Emissions

Assumptions	
Actual Pressure (in Hg)	26
Std Pressure (in Hg)	29.92
Std Temp (deg R)	537
Air density at standard conditions (ft ³ /lb)	13.52
Manufacturer's performance spec. grain loading limit (gr/scf)	0.0196
Unit conversion (gr/lb)	7,000
Time conversion (min/hr)	60
Universal Rate Constant (ft ³ -psia/lb-mol deg R)	10.73
Molecular Weight of Air (lb/lb-mol)	29

1996 Lactose Scrubber Calculation:

4.39 lb/hr

Note: 17.1 ft³/lb comes from the psychrometric chart for air at 135 F and 0.09 lb H2O per lb dry air (midpoint)

Lactose Scrubber PM Emissions								
Equipment Type	Equipment Name	1996 Dry Solids Output (lb/hr)	2007 Dry Solids Output (lb/hr)	Air Flow Rate (ACFM)	Act. Temp. (Deg R)	PM ^a Emissions (lb/hr)	PM Emissions (tpy)	IDAPA Exemptions
Lactose Scrubber	Niro	6,626	NA	38,000	595	4.39	19.21	58.01.01.223.03.I -Director's Exemption -no operating limitations (1996)
Lactose Scrubber	Niro	NA	7,621	38,000	595	5.04	22.10	
Lactose Scrubber Net Emissions Increase						0.66	2.88	

^a PM is assumed to equal to particulate matter less than 10 microns in diameter (PM₁₀)

2007 Mass Balance Calculation for Lactose Scrubber Emissions:
 (6,626 lb/hr dry solids) * X = (7,621 lb/hr dry solids)*(4.39 lb/hr PM)
 Solve for X.
 X = 5.04 lb/hr PM

Appendix D Baghouse PM Emissions

Equipment Name	Baghouse Type	Date Installed	1996 Dry Solids Output (lb/hr)	2007 Dry Solids Output (lb/hr)	Dry Solids Increase Output (lb/hr)	Cyclone Upstream of Baghouse	Calculated Throughput to Baghouse ^a	Baghouse PM Fractional Efficiency ^b	PM ^c Emissions Net Increase (lb/hr)	PM Emissions Net Increase (tpy)	IDAPA Exemptions
Lactose Baghouse	Polyester membrane	1996	6,626	7,621	995	Yes	99.5	99.99	0.010	0.044	58.01.01.220

Notes:

Cyclone Efficiency (%): 90

^a Throughput to baghouse = $(1-CE/100) \times 100 \times (\text{Dry Solids Output}) / (CE + BE \times (100-CE))$, where CE and BE are collection efficiencies for cyclone and baghouse, respectively.

^b Efficiencies provided by bag supplier; Bay Area Industrial Filtration

^c PM is assumed to equal to particulate matter less than 10 microns in diameter (PM₁₀)

Glanbia Foods Inc., Gooding, Idaho

Process Weight Calculations

Compliance with IDAPA Rule 701 PM Standard for Process Weight

Unit	Scrubber	Baghouse
Process Weight (lb/hr)	7,621	7,621
PM Emission Rate (lb/hr)	5.04	0.76
<i>Compliance with Allowable Emission Calculation</i>		
Calculated Allowable Emissions (E) (lb/hr) ¹	9.60	9.60
Compliance w/ PM Loading Standard	Yes	Yes

¹ General Restrictions - New Equipment:

If PW is less than 9,250 pounds per hour

$$E = 0.045(PW)^{0.6}$$

If PW is greater than 9,250 pounds per hour

$$E = 1.10(PW)^{0.25}$$

polyester

Date: March 30, 1998
 Filter ID: 6212-Testflow polyester
 Test Type: Fractional Efficiency
 Test Aerosol: KCl, Neutralized

Velocity: 10 FPM
 Requested by: TetraStar
 Manufacturer: TetraStar
 Loading Dust: SAE Ultrafine

Filter Status	Initial	Loaded
A_p (H.D.)	0.545	0.745
Size Range (µm)	Fractional Efficiency (%)	
0.3-0.5	98.755	99.691
0.5-0.7	99.632	99.945
0.7-1.0	99.794	99.990
1.0-2.0	99.830	100.000
2.0-3.0	99.905	100.000
3.0-5.0	99.957	100.000
>5.0	100.000	100.000

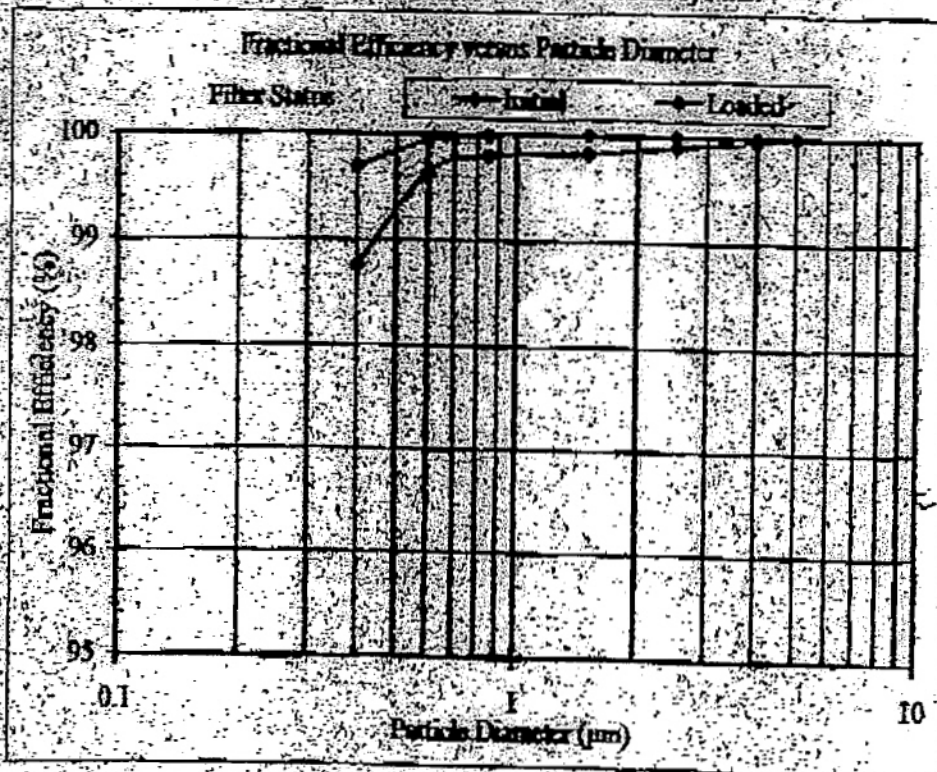
$$P_f = \frac{C_u - C_d}{C_u} \times 100\%$$

P_f = Fractional Efficiency

C_u = Particle Concentration Upstream of Filter

C_d = Particle Concentration Downstream of Filter

16oz polyester micubran



Appendix E
Air Dispersion Modeling Protocol,
with DEQ Approval Letter



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON, BOISE, ID 83706 · (208) 373-0502

C. L. "BUTCH" OTTER, GOVERNOR
TONI HARDESTY, DIRECTOR

March 26, 2007

Rick McCormick
CH2MHill
Boise Office

RE: Modeling Protocol for the Glanbia Foods Facility Located in Gooding, Idaho

Rick:

DEQ received your dispersion modeling protocol on March 23, 2007. The modeling protocol was submitted on behalf of Glanbia Foods, Inc. The modeling protocol proposes methods and data for use in the ambient impact analyses of a Permit to Construct application for an increase in lactose and whey protein concentrate production at their facility in Gooding, Idaho.

The modeling protocol has been reviewed and DEQ has the following comments:

- Comment 1: The protocol does not discuss how downwash will be assessed. Since the scrubber stack is the controlling source, I would suggest using building parameters for the controlling building for this source. The controlling building is the one that results in the largest GEP stack height. Please provide calculations supporting the selection of the dominant building with the application.
- Comment 2: The application should provide documentation and justification for stack parameters used in the modeling analyses, clearly showing how stack gas temperatures and flow rates were estimated. In most instances, applicants should use typical parameters, not maximum temperatures and flow rates.

DEQ's modeling staff considers the submitted dispersion modeling protocol, with resolution of the additional items noted above, to be approved. It should be noted, however, that the approval of this modeling protocol is not meant to imply approval of a completed dispersion modeling analysis. Please refer to the *State of Idaho Air Quality Modeling Guideline*, which is available on the Internet at http://www.deq.state.id.us/air/permits_forms/permitting/modeling_guideline.pdf, for further guidance.

If you have any further questions or comments, please contact me at (208) 373-0112.

Sincerely,

Kevin Schilling
Stationary Source Air Modeling Coordinator
Idaho Department of Environmental Quality
208 373-0112

Air Dispersion Modeling Protocol for Glanbia Foods, Gooding Facility

**(15-day Permit Construction
Approval)**

Gooding, Idaho

Glanbia

Submitted to:

Idaho Department of Environmental Quality

March 2007

Prepared By:

CH2MHILL

Brief Project Background

Glanbia Foods, Inc. (Glanbia) is in the process of preparing a 15-day Permit to Construct (PTC) application for an increase in lactose and whey protein concentrate (WPC) production in Gooding, Idaho. The production for lactose and WPC processes were exempted by the Idaho Department of Environmental Quality (IDEQ) from obtaining an air quality Permit-to Construct (PTC) in 1996. Potential emissions are based on the facility operating for 24 hours a day, 7 days a week.

An air quality impact analysis will be performed in support of the pre-permit construction approval per IDAPA 58.01.01.213. Idaho regulation requires the facility applying for a PTC to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) and with Toxic Air Pollutant (TAP) standards (IDAPA 58.01.01.210).

This air dispersion modeling protocol is being submitted to the IDEQ for approval prior to the initiation of the air quality modeling for the Ganbia facility. This document summarizes the modeling methodology that will be used to evaluate the facility's impacts to air quality with respect to criteria and toxic air pollutants. It has been prepared based on the U.S. Environmental Protection Agency (EPA) *Guidelines on Air Quality Models* (GAQM), and the *State of Idaho Air Quality Modeling Guideline* (ID AQ-01, December 31, 2002).

Sources

Process Description – Lactose

Lactose is sent through an evaporator, concentrator, crystallizer, centrifuge, and then a dryer. The exhaust gas from the dryer is sent through a cyclone where product is recovered and recirculated back to the product stream. The product that is not recovered in the cyclone passes through a scrubber. From the dryer, lactose is transferred to a sifter, mill, classifier and baghouse where the finished product is recovered. The finished product is sent on for packaging. Traces of particulate matter are released to the atmosphere separately through the top of a scrubber and baghouse.

The solids feed rate exiting the lactose dryer is currently estimated at 6,626 pounds per hour (lb/hr). The new solids feed rate is estimated at 7,621 lb/hr, resulting in a net increase of 995 lb/hr of whey product.

Process Description – WPC

Whey protein concentrate is sent through an evaporator where the material is concentrated. This concentrated liquid is either sold as finished product, or is transferred to the dryer for further processing. The exhaust from the dryer is sent through a cyclone

Glanbia Foods, Inc.
Air Dispersion Modeling Protocol

and then to a baghouse where fine whey powder is recovered. The recovered material is returned to the main product stream, which is sifted and sent on for packaging. Traces of particulate matter are released to the atmosphere through the top of a baghouse.

The solids feed rate exiting the WPC dryer is currently estimated at 4,300 lb/hr. The new solids feed rate exiting the WPC dryer is estimated at 5,750 lb/hr, resulting in a net increase of 1,450 lb/hr of whey product.

Emission Control Description

The lactose scrubber is considered an emissions control device for particulate matter.

Source Parameters

The EPA approved screening model, SCREEN3, will be used as the preferred model to evaluate the whey production increase.

The modeling analysis proposed will use a combined emission rate for PM₁₀ through a single representative stack (*Merged Parameters for Multiple Stacks, pg 2-3, Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised, USEPA, October 1992*). A copy of the referenced guidance material is included in the attachment.

Each of the stacks are located on the same roof tier within approximately 30-40 feet of one another. Stack parameters and corresponding emission rates from the lactose scrubber, lactose baghouse, and WPC baghouse were utilized to evaluate the lowest value of **M** as a representative stack. The source parameters are summarized in Table 1 along with the lowest value of **M**. A facility layout showing the location of buildings and emissions sources will be included in the final report.

TABLE 3
Stack Parameters

Source ID	Stack Height (m)	Flow (acfm)	Flow (cms)	T (k)	Q (g/s)	M ₁
Scrubber	25.6032	38,000	17.93	330.37	0.082	1,852,262
Lactose Baghouse	25.6032	4,800	2.27	322.04	0.001	14,824,055
WPC Baghouse	25.6032	41,000	19.35	347.04	0.002	90,971,154

₁ Lowest M is used for combined stack emissions: M = stack height * flow * T/Q (emission rate)

Emissions

The estimated Particulate Matter (PM₁₀) emissions by source are shown in Tables 2 and 3. The emission rates are based on a constant solids output.

TABLE 2
Annual Emission Rates in Tons per Year

Glanbia Foods, Inc.
Air Dispersion Modeling Protocol

Source ID	PM ₁₀	IDAPA Exemptions
Lactose Scrubber	22.10	
Lactose Baghouse	0.044	58.01.01.220
WPC Baghouse	0.064	58.01.01.220
Total	22.208	

TABLE 3
Maximum Hourly Emission Rates in Pounds per Hour

Source ID	PM ₁₀	IDAPA Exemptions
Lactose Scrubber	5.04	
Lactose Baghouse	0.010	58.01.01.220
WPC Baghouse	0.015	58.01.01.220
Total	5.065	

Regulatory Review

Standards and Criteria Levels

Table 4 summarizes applicable criteria including:

- Significant contribution levels (SCL),
- National Ambient Air Quality Standards (NAAQS).

TABLE 4
Regulatory Standards and Significance Levels

Pollutant	Averaging Period	NAAQS		SCL (µg/m ³)
		µg/m ³	ppm	
PM ₁₀	Annual	50	--	1
	24-Hour	150	--	5

SCREEN3 modeled concentrations will be compared to the applicable Idaho significant contribution levels (SCL) shown in Table 4. If the predicted impacts are not significant (that is, less than the SCL), the modeling is complete for that pollutant under that averaging time. A preliminary modeling run for PM₁₀ resulted in concentrations below the SCL. Therefore, a more refined modeling analysis is not anticipated.

Glanbia Foods, Inc.
Air Dispersion Modeling Protocol

However, if impacts are significant using SCREEN3, a more refined analysis will be conducted for demonstration of compliance with the NAAQS. CH2M HILL will submit an amended protocol to DEQ for approval if refined modeling is required.

Appendix F
EPA Guidance for Estimating “M”

Appendix F
Evaluate Lowest Value for M

Source	Stack Height- hs (m)	Stack Gas Flow (cfm)	Stack Gas Flow (cms)	Temp (Deg K)	Emission Rate- Q (g/s)	M
Lactose Scrubber	25.6	38,000	17.93	330.37	0.083	1,827,662
Lactose Baghouse	25.6	4,800	2.27	322.04	0.001	14,896,772

Note: $M = hs \cdot \text{flow} \cdot \text{temp} / Q$

Lowest M is used for combined stack emissions

2.2 Merged Parameters for Multiple Stacks

Sources that emit the same pollutant from several stacks with similar parameters that are within about 100 meters of each other may be analyzed by treating all of the emissions as coming from a single representative stack. For each stack compute the parameter M:

$$M = (h_s V T_s) / Q \quad (2.1)$$

where M = merged stack parameter which accounts for the relative influence of stack height, plume rise, and emission rate on concentrations

h_s = stack height (m)

$V = (\pi/4) d_s^2 v_s$ = stack gas volume flow rate (m^3/s)

d_s = inside stack diameter (m)

v_s = stack gas exit velocity (m/s)

T_s = stack gas exit temperature (K)

Q = pollutant emission rate (g/s)

The stack that has the lowest value of M is used as a "representative" stack. Then the sum of the emissions from all stacks is assumed to be emitted from the representative stack; i.e., the equivalent source is characterized by h_{s1} , V_1 , T_{s1} and Q , where subscript 1 indicates the representative stack and $Q = Q_1 + Q_2 + \dots + Q_n$.

The parameters from dissimilar stacks should be merged with caution. For example, if the stacks are located more than about 100 meters apart, or if stack heights, volume flow rates, or stack gas exit temperatures differ by more than about 20 percent, the resulting estimates of concentrations due to the merged stack procedure may be unacceptably high.

Appendix G

Screen3 Summary Table and Output Results

Appendix G

Screen3 Modeling Results

SCREEN3 1-HR Ave. Concentration (ug/m ³)	SCREEN3 Persistent Factors	Adjusted Ave. Period	Estimated Ambient Concentration (ug/m ³)	Significant Contribution (ug/m ³)	Below Significant Contribution
1.625	24-Hour	0.4	0.65	5	Yes
	Annual	0.08	0.13	1	Yes

Note: Estimated Ambient Conc. = SCREEN3 1-hr ave. conc. x adjusted ave. period

04/04/07
08:07:16

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

3labia Foods Inc., Gooding Lactose Production Increase

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = .840000E-01
STACK HEIGHT (M) = 25.6000
STK INSIDE DIAM (M) = 1.1200
STK EXIT VELOCITY (M/S) = 18.2033
STK GAS EXIT TEMP (K) = 330.3700
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = 12.5000
MIN HORIZ BLDG DIM (M) = 45.7300
MAX HORIZ BLDG DIM (M) = 45.7300

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM
VOLUME FLOW RATE = 38000.000 (ACFM)

BUOY. FLUX = 6.332 M**4/S**3; MOM. FLUX = 92.161 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	U10M STAB	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
-------------	-------------------	--------------	---------------	---------------	-----------------	----------------	----------------	-------

10.	.0000	1	1.0	1.1	320.0	105.68	7.91	7.34	NO
100.	1.341	4	15.0	17.3	4800.0	28.29	8.27	12.98	HS
200.	1.439	4	8.0	9.2	2560.0	34.88	15.79	17.49	HS
300.	1.450	4	8.0	9.2	2560.0	34.88	22.77	20.41	HS
400.	1.369	4	8.0	9.2	2560.0	34.88	29.57	23.24	HS
500.	1.338	3	3.5	3.8	1120.0	47.84	55.14	33.05	NO
600.	1.339	3	2.5	2.7	800.0	56.74	65.32	39.34	NO
700.	1.303	3	2.5	2.7	800.0	56.74	75.02	45.01	NO
800.	1.264	3	2.0	2.2	640.0	64.52	84.88	51.08	NO
900.	1.199	3	1.5	1.6	480.0	77.50	94.85	57.47	NO
1000.	1.159	3	1.5	1.6	480.0	77.50	104.17	62.91	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 10. M:
125. 1.605 4 15.0 17.3 4800.0 28.91 10.23 15.08 HS

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** REGULATORY (Default) ***

PERFORMING CAVITY CALCULATIONS
WITH ORIGINAL SCREEN CAVITY MODEL
(BRODE, 1988)

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = .0000	CONC (UG/M**3) = .0000
CRIT WS @10M (M/S) = 99.99	CRIT WS @10M (M/S) = 99.99
CRIT WS @ HS (M/S) = 99.99	CRIT WS @ HS (M/S) = 99.99
DILUTION WS (M/S) = 99.99	DILUTION WS (M/S) = 99.99
CAVITY HT (M) = 12.67	CAVITY HT (M) = 12.67
CAVITY LENGTH (M) = 41.80	CAVITY LENGTH (M) = 41.80
ALONGWIND DIM (M) = 45.73	ALONGWIND DIM (M) = 45.73

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

END OF CAVITY CALCULATIONS

*** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
-----	-----	-----	-----
SIMPLE TERRAIN	1.605	125.	0.

** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **
